## UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

ZHAOYIN WANG, Plaintiff,

Civil Action No.

٧.

BETA PHARMA, INC., DON ZHANG, AND ZHEJIANG BETA PHARMA, CO., LTD., Defendants.

DECEMBER 1, 2014

## STATEMENT UNDER STANDING ORDER IN REMOVED CASES

Pursuant to this Court's Standing Order in Removed Cases, defendants Beta Pharma, Inc. and Don Zhang hereby file and serve the following statement:

- 1. Defendants first received copies of the Summons and Complaint in the action hereby removed, *Wang v. Beta Pharma, Inc.*, No. NNH-CV-14-6050848, on November 4, 2014.
- 2. Defendant Don Zhang was served with a copy of such Summons and Complaint on October 28, 2014, through service on the Office of the Secretary of the State of Connecticut. Defendant Beta Pharma, Inc. has not been served.
  - 3. Neither Defendant is a citizen of Connecticut.
- 4. Removal has taken place within thirty days after the date on which Defendants first received a copy of the aforementioned Summons and Complaint, allowing for the holiday and weekend court closures on November 28-30, 2014.
- 5. There are no properly joined and served defendants who have not joined in this Notice. The Summons and Complaint name Zhejiang Beta Pharma Co., Ltd, as a defendant, but it is not a properly joined and served defendant.



DEFENDANTS BETA PHARMA, INC. AND DON ZHANG,

By:\_\_\_/s/\_

Michael G. Caldwell, ct26561 LeClairRyan, A Professional Corporation 545 Long Wharf Drive, Ninth Floor New Haven, Connecticut 06511 Telephone: (203) 672-1636

Telephone: (203) 672-1636 Facsimile: (203) 672-1656

Email michael.caldwell@leclairryan.com

-- Their Attorney--

## **CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing was sent by first-class mail, postage prepaid, to all counsel and pro se parties of record in this action on this 1st day of December, 2014, as follows:

Jonathan Katz, Esq. Jacobs & Dow, LLC 350 Orange Street New Haven, CT 06511

/s/
Michael G. Caldwell, ct26561